IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Global Interactive Media, Inc., Plaintiff, v. AMC Networks Inc., Defendant.	Case No. 1:17-cv- **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Global Interactive Media, Inc. ("GIM") brings this patent-infringement action against AMC Networks Inc. ("AMC").

Parties

1. GIM is a Belizian corporation based in Belize.

2. AMC is a Delaware corporation, having its principal place of business in New York, New York.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq*.

4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court may exercise personal jurisdiction over AMC. This is because AMC conducts continuous and systematic business in Illinois and this District. For example, AMC sells services to AMC customers in this District. This patent-infringement claim arises directly from AMC's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over AMC would be consistent with the Illinois long-arm statute, 735 ILCS § 5/2-209,

and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2).

Count 1 – Infringement of U.S. Patent No. 7,574,721

7. GIM owns United States Patent 7,574,721 (the "'721 patent") (attached as Exhibit A).

8. AMC is infringing at least one of the 35 methods and systems claimed in the '721 patent by providing the AMC TV Listings service.

9. For example, and for illustration of one of the 35 claims of the '721 patent that GIM alleges the AMC TV Listings service infringes, the service infringes claim 1 of the '721 patent as follows:

a. Claim 1 is a "method for identifying at least one broadcast provider through a combination of a geographic identification code and a broadcast identifier, the method comprising: digitally storing, in a database, one or more geographic identification codes that are each associated with at least one area or location in which a broadcast is receivable from at least one broadcast provider[.]" (Ex. A, 17:44-50.) The AMC Channel Finder service digitally stores zip codes in a database, which are associated with service areas in which AMC broadcasts are receivable.

b. Claim 1 involves "digitally storing, in the database, one or more broadcast identifiers that are each associated with at least one broadcast provider[.]" (Ex. A, 17:51-53.) The AMC Channel Finder service digitally stores in a database broadcast identifiers (e.g., Layer3, RCN, DISH, etc.) that correspond to the service providers that carry AMC's broadcasts.

c. Claim 1 involves "receiving at least one user related geographic identification code[.]" (Ex. A, 17:54-55.) The AMC Channel Finder service receives a user related geographic identification code when the user enters her zip code into the service website, 60606 for example.

d. Claim 1 involves "determining, by a processor, a subset of data from the database using the received at least one user related geographic identification code, the subset of data comprising at least one of the stored one or more broadcast identifiers that are associated with at least one of the stored one or more geographic identification codes that corresponds to the received at least one user related geographic identification code[.]" (Ex. A, 17:60-67.) The AMC Channel Finder service determines by processor, using the user's zip code, a subset of data comprising stored broadcast identifiers (e.g., Layer3, RCN, DISH, etc.) that correspond to the service providers that carry AMC's broadcasts within the user's service area.

e. Claim 1 involves "receiving at least one user related broadcast identifier[.]" (Ex. A, 17:56.) The AMC Channel Finder service receives a user related broadcast identifier when the user selects her service provider (e.g., DISH).

f. Claim 1 involves "identifying, by the processor, at least one broadcast provider using at least both the subset of data and received at least one user related broadcast identifier[.]" (Ex. A, 18:1-3.) The AMC Channel Finder service—using the subset of data based on the user's zip code and the user-related broadcast identifier of service provider—identifies, for example, DISH as a broadcast provider of AMC programming on Channel 131.

Count 2 – Infringement of U.S. Patent No. 8,032,907

10. GIM owns United States Patent 8,032,907 (the "'907 patent") (attached as Exhibit

B).

11. AMC is infringing at least one of the 90 methods and systems claimed in the '907 patent by providing the AMC Scheduler service.

12. For example, and for illustration of one of the 90 claims of the '907 patent that GIM alleges that the AMC Scheduler service infringes, the service infringes claim 18 of the '907 patent as follows:

a. Claim 18 claims a "method for providing recipients of a broadcast with automated information about program material, the method comprising: broadcasting program material in at least one broadcast[.]" (Ex. B, 19:13-16.) The AMC Scheduler service provides viewers of television programs with automated information about programs broadcasted by AMC. For example, a user may use the service to obtain automated information about program material to be broadcast tomorrow evening, which may be, for example, the movie *First Blood*.

b. Claim 18 includes the step of "receiving one or more user inquiries from one or more recipients of said at least one broadcast, said one or more inquiries including broadcast identifier information[.]" (Ex. B, 19:17-19.) A user may access the AMC Scheduler service's website and inquire about the program material to be broadcast tomorrow evening. The inquiry includes broadcast identifier information when the user enters the date for which she would like to inquire about programming—tomorrow night.

c. The method of claim 18 involves "creating a program description file comprising program information related to program material to be broadcast in the future[.]" (Ex. B, 19:20-22.) AMC created a program description file describing the film *First Blood*: "Rambo (Sylvester Stallone) takes on sheriff (Brian Dennehy) and National

Guard."

d. Next, claim 18 involves "communicating the program information into a programmed data processor[.]" (Ex. B, 19:23-24.) The AMC Scheduler service user is able to learn about *First Blood* because AMC has a programmed data processor that communicates the program information to the AMC Scheduler service.

e. Claim 18 involves "synchronizing said communicated program information with said program material of said at least one broadcast[.]" (Ex. B, 19:25-26.) AMC synchronizes the program information with the broadcast of *First Blood* tomorrow night.

f. Claim 18 involves "using said data programmed data processor to communicate, to the one or more recipients, program information that corresponds to the broadcast identifier information included in said one or more inquiries, wherein at least one of the program description file, the program information, and the synchronized program information is associated with the broadcast identifier information." (Ex. B, 19:28-35.) The AMC Scheduler service communicates to the user that *First Blood* will be broadcast by AMC tomorrow night, and that "Rambo (Sylvester Stallone) takes on sheriff (Brian Dennehy) and National Guard."

Count 3 – Infringement of U.S. Patent No. 6,314,577

13. GIM owns United States Patent 6,314,577 (the "'577 patent") (attached as Exhibit C).

14. AMC is infringing at least one of the 130 methods and systems claimed in the '577 patent by providing the AMC Scheduler service.

15. For example, and for illustration of one of the 130 claims of the '577 patent that GIM alleges the AMC Scheduler service infringes, the service infringes claim 94 of the '577 patent

as follows:

a. Claim 94 is a "method for providing listeners or viewers of a radio or television broadcast with automated information about program material, comprising the steps of: broadcasting at least one radio or television broadcast[.]" (Ex. C, 23:15-18.) The AMC Scheduler service provides viewers of television programs with automated information about programs broadcasted by AMC.

b. Claim 94 involves "receiving user inquiries from a listener or viewer of said radio or television broadcast[.]" (Ex. C, 19-20.) A user may access the AMC Scheduler service's website and inquire about a television program she is viewing on AMC at 7:00 p.m. CST.

c. Claim 94 involves "creating a program description file[.]" (Ex. C, 23:21.) The user inquiring about the program broadcast by AMC at 7:00 p.m. CST would learn that the program is the movie *Predators*, in which: "A mercenary (Adrien Brody) and his comrades fight for survival against a band of alien hunters."

d. The method of claim 94 involves "communicating program list information into a programmed data processor[.]" (Ex. C, 23:22-23.) AMC communicates into the AMC Scheduler service's programmed data processor a list of programs to be aired so that the service may display a list of scheduled programs.

e. Claim 94 involves "correlating said program descriptions of program material with said program list information and generating information in a database responsive to only a broadcast identifier[.]" (Ex. C, 23:24-27.) AMC correlates the description of *Predators* to the list of scheduled programs so that the description is correlated and responsive to the 7:00 p.m. identifier of *Predators*.

f. Claim 94 involves "using said programmed data processor to communicate said program description file responsive to said user inquiry." (Ex. C, 23:28-30.) The AMC Scheduler service uses the data processor to communicate the description of *Predators* to the user when the user accesses the service during the 7:00 p.m. CST broadcast of *Predators* to inquire about the program.

Prayer for Relief

WHEREFORE, GIM prays for the following relief against AMC:

(a) Judgment that AMC has directly infringed claims of the'721 patent, '907 patent, and the '577 patent;

(b) For a reasonable royalty;

(c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law; and

(d) For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

GIM demands a trial by jury on all matters and issues triable by jury.

Date: February 8, 2017

Respectfully Submitted,

/s/ Matthew M. Wawrzyn

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